

AO 91 (Rev. 11/11) Criminal Complaint

FILED

APR 26 2018

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature] DEPUTY

SEALED

UNITED STATES DISTRICT COURT

for the
Western District of Texas

United States of America

v.

April TORRES (1)
Lana Rose SULLIVAN (2)
Edgar Ivan HERNANDEZ (3)

Case No. SA: 18-MJ-0537

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 25, 2018 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

Code Section

21 U.S.C. §846;
21 U.S.C. §841(a)(1);
21 U.S.C. §841(b)(1)(A)(i);
21 U.S.C. §841(b)(1)(A)(viii);
21 U.S.C. §841(b)(1)(A)(C)

Offense Description

Conspiracy to possess with the intent to distribute to wit: 1 kilogram or more of heroin,
500 grams or more of a mixture containing methamphetamine, and a quantity less than
500 grams of cocaine
Possession with the intent to distribute to wit: 1 kilogram or more of heroin, 500 grams
or more of a mixture containing methamphetamine, and a quantity less than 500 grams
of cocaineMaximum Penalties: 10 years to life imprisonment; \$10,000,000 fine; At least 5 years
supervised release; \$100 mandatory special assessment

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

- ☒
- Sworn to before me and signed in my presence.
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- ☐
- Sworn to telephonically and signed electronically.

Date:

4/26/2018City and state: San Antonio, Texas[Signature]

Complainant's signature

Douglas S. Davis, DEA Task Force Officer

Printed name and title

[Signature]

Judge's signature

Richard B. Farrer, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

My name is Douglas S. Davis. I am certified as a peace officer by the laws of the State of Texas. I am currently assigned to the U.S Drug Enforcement Administration (DEA) District Office in San Antonio, Texas as a Task Force Officer (TFO).

In December 2017, DEA initiated an investigation of April TORRES and Lana Rose SULLIVAN, individuals who reside in the San Antonio, Texas area. The investigation established that TORES and SULLIVAN are distributors of large quantities of controlled substances to include cocaine, methamphetamine and heroin. TORRES resides at ***** Rimline, San Antonio, Texas and is believed to have participated in the past with Edgar Ivan HERNANDEZ in the distribution of controlled substances. Based on physical surveillance, agents determined that TORRES would often meet with HERNANDEZ in order to receive quantities of controlled substances which were delivered to associates of TORRES in San Antonio. On many of these occasions, TORRES associates would travel to SULLIVAN'S residence at ***** Shanefield Road, San Antonio, Texas.

On April 25, 2018, investigators established surveillance at the Valero Gas Station, located at Fisher Road and IH-35 South San Antonio, Texas.

Investigators observed TORRES meet with HERNANDEZ. After the agents observed what appeared to be a short conversation between the pair, they subsequently departed. Surveillance was maintained on TORRES. Consequently, investigators coordinated a traffic stop of TORRES with a Texas Department of Public Safety (TX DPS) Trooper. TX DPS Trooper Bret Whillis conducted the stop for the traffic violation of: failed to maintain single lane, and ultimately obtained consent to search TORRES' vehicle. The search yielded 1,178 grams of suspected heroin, 53 grams of suspected fentanyl, 31 grams of crystal methamphetamine, and 100 grams of cocaine. Simultaneously, investigators approached SULLIVAN'S residence and obtained consent to search it. The search yielded approximately 1,041.6 grams of suspected methamphetamine. Both TORRES and SULLIVAN were advised of the Miranda Warnings and waived their right to counsel. Both TORRES and SULLIVAN admitted knowledge to possessing the aforementioned narcotics. TORRES further stated that the man she met with at the gas station is the same man who gave her the narcotics.

AFFIANT SAYETH FURTHER NOT.



DOUGLAS S. DAVIS
DEA TASK FORCE OFFICER

Signed and sworn before me on the April 26, 2018.



RICHARD B. FARRER
UNITED STATES MAGISTRATE JUDGE